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AK # 8211140

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
v.)
)
FANNY MARGARITA PALACIOS-IBARRA)
a/k/a, "La Mexicana",)
a/k/a, "Mex", a/k/a, "La Loca",)
a/k/a, "Karla", a/k/a, "Kara",)
a/k/a, Marangeli Castro Rivera,)
a/k/a, Marangeli Rivera Castro,)
GERSON NUNEZ,)
MIRIAN YNOCENCIA NUNEZ a/k/a, Mirian)
Ynocencia Ceballos-Liriano,)
JUAN FRANCISCO "Frank" RINCON VALERA,)
FELIPE ALBERTO NUNEZ MERCEDES,)
ANTONIO PANIAGUA HODGE,)
JULIO ENRIQUE VELEZ a/k/a, Antonio)
Dominguez, a/k/a, "Tony",)
KARA GRACE CLEVELAND a/k/a,)
"L'Americana", a/k/a, "La Gorda",)
LUIS SUAZO GUERRERO a/k/a, Papito",)
SALVADOR AYALA SANCHEZ,)
EDWARD S. LABERE a/k/a, "El Indio",)
EFRAIN LECHUGA GUTIERREZ)
a/k/a, Lucas Gutierrez,)
a/k/a, Antonio Gutierrez,)
a/k/a, "Tony", a/k/a, "Lechuga",)
ARELIS YNOCENCIA CEBALLOS-LIRIANO,)
FELIPE SANCHEZ MONTES a/k/a, Felipe)
Salazar, a/k/a Homero Picazo,)
a/k/a, "Marco", a/k/a, "Marcos",)
)
Defendants.)
_____)

Case No. 3:99-cr-036-HRH

MOTION TO REDUCE SENTENCE

[Filed on shortened time.]

The defendant, by and through his attorney of record John C. Pharr, of the LAW OFFICES OF JOHN C. PHARR, respectfully moves this court, pursuant to 18 U.S.C. § 3582(c), for an order reducing the term of imprisonment from 151 months to a sentence of time served on the grounds that the retroactive amendment to the Crack Cocaine Guideline changes the base offense level in defendant's presentence report from 34 to 32, and a criminal history category of I. Defendant was subject to a 60 month mandatory minimum.

This motion is supported by the attached memorandum of law.

DATED at Anchorage, Alaska, this 3rd day of March 2008.

s/John C. Pharr
Attorneys for Defendant,
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on
March 4, 2008, a copy
of the foregoing was served
electronically:

U.S. Attorney's Office

s/John C. Pharr